

I think I was number five, so we're moving right along. My name is Kate Flaumer. I'm here a private citizen. I row, I kayak, I swim in these waters. I'm also – my concern has led me to be a member of the Board of Directors of the Puget Sound Keeper Alliance. Sue just spoke on behalf on the Sound Keeper Alliance. As a former federal prosecutor, I'm very familiar with criminal side of the Clean Water Act. I'm not so familiar with the civil side and how this all fits together. I'm learning a lot as we go along. What I do know as a long time resident of this area is that we have unfortunate history of making short-sighted decisions. Often at substantial savings which end up in huge costs down the road. We have resisted the costs of planning for the future in such areas as our mass transportation. And we're finding ourselves, thirty years down the road facing astronomical costs and huge public dissention and breathing air that rates among the worst five percent in the country. I think that history bears looking at and bears avoiding. We cannot afford to take our water system for granted. Or to offer it's degradation free to industry and consumers. We're looking at huge population growth in this area. I've seen different estimates by different agencies, but it is uncontested that Washington State is one of the five fastest growing states in the country. There are some estimates that have the population of this state doubling by 2020. I know the Action Team estimates that the Puget Sound Basin is going to go up in population by approximately thirty percent by 2020. That's eighteen years from now. Let's not be blind to the enormous stress that will put on our water supply and our beautiful, but endangered Puget Sound. We need to step up to this challenge now and we need to act to regulate stormwater pollution which is the biggest problem we have. Bigger than point sources as Sue said. The revised permit, the Industrial Stormwater General Permit is a significant improvement over the earlier draft. It does require the industry to monitor, to take and analyze samples. I agree with Keith Johnson, I think there's going to be a real development of easy sampling products. This is absolutely critical as he said to determine whether industrial discharges are causing or contributing to violations of water quality standards. I want to echo what Sue Jorger said about the permit system needs to be made practically enforceable. This is the area where I think further refinements are required to narrow the loop-holes. Particularly in light of what we know is under staffing at Ecology and the Fact Sheet that Ecology put out with the permit which states that "based on site inspections, no more than 25% of the industries looked could be considered to be in full compliance with BMPs," twenty-five percent. So I don't think it's realistic to assume that checking a box is going to do it. And I don't think it's realistic to expect Ecology to be out there finding out whether BMPs are being adhered to in all of these different industries. So I think as Sue said that exceptions to sampling and analyzing by using standard mixing zones should not be used unless the industries can establish that they will not damage the ecosystem. The same that they are required to establish it, if I understand this right, for the wider mixing zones. Similarly, the compliance schedule loop-hole allowed in the new draft must be examined and tightened. The number of years that can go on with the compliance schedule does not make much sense if everybody's to be treated in an even-handed way. Again, if permittees are not required to file the changes and the updates in their pollution prevention plans, there's no way for anybody else to look to see what those changes are, whether they're adequate or what in fact is going on. So it seems to me if there is a reason for filing pollution prevention plans and everyone seems to agree there is, then the same reason applies to filing the updates and the reference that we should be able to get them under the Freedom of Information Act. The Public Disclosure Act in Washington State only applies to records held by an official agency. So if they're not submitted to the Department of Ecology, there is no way that any citizen has access to the updates. So I think it's critical that updates to the Stormwater Pollution Prevention Plans be submitted to Ecology and thereby be made available. These are only going to happen

periodically. And it should not be that big a burden on the industry. When we look at the point source pollution permittees, we know that they discharge industrial process water. And we know that they've paid the costs of monitoring and reporting their discharges for years. The results of that system have been reduced discharges and enhanced compliance with water quality standards. We must advance these procedures to address our next big challenge – stormwater runoff. We must require the same kinds of investments by the rest of the industry and industrial community and by ourselves as consumers. We simply cannot allow industry or consumers to spend away our precious water quality for free. Thank you.